

PBW

*Consulting Engineers
and Scientists*

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SUPERFUND DIV.
REMEDIAL BRANCH
(6SF-8)

PASTOR, BEHLING & WHEELER, LLC
2000 S. Mays, Suite 300
Round Rock, TX 78664

Tel (512) 671-3434
Fax (512) 671-3446

March 31, 2008
(PBW Project No. 1352)

VIA OVERNIGHT DELIVERY

Mr. Gary Miller, Remedial Project Manager
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-AP)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Ms. Barbara A. Nann, Assistant Regional Counsel
U.S. Environmental Protection Agency, Region 6
Superfund Division (6RC-S)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Additional Proposed RI/FS Subcontractor, Gulfco Marine Maintenance Site, Freeport,
Texas

Dear Mr. Miller and Ms. Nann:

Pursuant to Section XI, Paragraph 42 of the amended Unilateral Administrative Order (UAO), effective January 31, 2008, for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW), on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow), herewith provides the names, titles, and qualifications for an additional subcontractor performing work in conjunction with RI/FS activities. In accordance with the requirements of Paragraph 52 of the UAO, I certify that I have been fully authorized by these Respondents to submit the information included herein and to legally bind these Respondents thereto.

Fugro Consultants, Inc. (Fugro) will be a subcontractor for Cone Penetrometer Testing (CPT) borings/piezometer construction. Fugro's qualifications and insurance certificate are provided as Attachments A and B, respectively, to this letter. As a subcontractor to PBW, Fugro will be covered under PBW's Quality Management Plan (QMP). Consistent with the requirements of Section XI Paragraph 42, we will notify EPA of any changes or additions to the RI/FS project team. As we recently discussed, we have scheduled CPT field activities to start on May 12, 2008. We will let you know if there are any changes to that schedule.



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Mr. Miller and Ms. Nann

March 31, 2008

Page 2 of 2

Thank you for the opportunity to submit this information. Should you have any questions, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

A handwritten signature in black ink, appearing to read "Eric F. Pastor", with a long horizontal flourish extending to the right.

Eric F. Pastor, P.E.
Principal Engineer

cc: Mr. Brent Murray – Environmental Quality, Inc.
Mr. Rob Rouse - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP

ATTACHMENT A
FUGRO CONSULTANTS, INC.
QUALIFICATIONS

FUGRO CONSULTANTS, INC. QUALIFICATIONS

Fugro Consultants owns a fleet of land drilling equipment including all-terrain vehicles, nearshore vessels, and cone penetrometer testing (CPT) units. This equipment is capable of drilling to depths in excess of 200 feet. For most projects, Fugro operates its own equipment. The result is a solid, controlled response to scheduling requirements.

As a leader in the development and application of CPT, Fugro notes these advantages of the system: no soil cuttings; limited weather constraints; and site access flexibility (no drilling mast). The company has extensive experience in correlating CPT data with soil borings.

Fugro owns and operates each of the following site exploration tools:

- Cone Penetrometer Testing (CPT)
- Conventional and wireline rock coring
- Direct Push Technology (ROST, MIP, dilatometer testing)
- Geoprobe units (truck, track, tractor, skid-mounted)
- Drilling equipment (hollow-stem and rotary wash rigs: truck, track, and buggy-mounted)
- Jack-up barge for shallow water, nearshore drilling

ATTACHMENT B

**FUGRO CONSULTANTS, INC.
INSURANCE CERTIFICATE**

ACORD™ CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)
01/29/2008

PRODUCER
Aon Risk Services Southwest, Inc.
fka Aon Risk Services of Texas, Inc.
dba Aon Risk Ins Services of TX, Inc.
CA Lic.# 0559715
1330 Post Oak Blvd. Suite 900
Houston TX 77056-3089 USA
PHONE-(832) 476-6000 FAX-(832) 476-6590

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY
AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS
CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE
COVERAGE AFFORDED BY THE POLICIES BELOW.

INSURED
Fugro Consultants, Inc.
6105 Rookin
Houston TX 77074 USA

INSURERS AFFORDING COVERAGE		NAIC #
INSURER A:	Liberty Mutual Insurance Co.	23043
INSURER B:	Liberty Insurance Corporation	42404
INSURER C:	National Liability & Fire Ins	20052
INSURER D:		
INSURER E:		

COVERAGES

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	ADD'L INSRD	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS	
A		GENERAL LIABILITY <input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY CLAIMS MADE <input checked="" type="checkbox"/> OCCUR _____ GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC	TB1641005066037	10/01/07	10/01/08	EACH OCCURRENCE	\$1,000,000
						DAMAGE TO RENTED PREMISES (Ea occurrence)	\$100,000
						MED EXP (Any one person)	\$5,000
						PERSONAL & ADV INJURY	\$1,000,000
						GENERAL AGGREGATE	\$2,000,000
						PRODUCTS - COMP/OP AGG	\$2,000,000
A		AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS <input type="checkbox"/> NON OWNED AUTOS _____	AS1641005066027	10/01/07	10/01/08	COMBINED SINGLE LIMIT (Ea accident)	\$2,000,000
						BODILY INJURY (Per person)	
						BODILY INJURY (Per accident)	
						PROPERTY DAMAGE (Per accident)	
		GARAGE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> _____				AUTO ONLY - EA ACCIDENT	
						OTHER THAN AUTO ONLY: EA ACC AGG	
C		EXCESS / UMBRELLA LIABILITY <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS MADE <input type="checkbox"/> DEDUCTIBLE <input type="checkbox"/> RETENTION	ARS4794	10/01/07	10/01/08	EACH OCCURRENCE	\$5,000,000
						AGGREGATE	\$5,000,000
B		WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR / PARTNER / EXECUTIVE OFFICER/MEMBER EXCLUDED? If yes, describe under SPECIAL PROVISIONS below	WA764D005066017	10/01/07	10/01/08	<input checked="" type="checkbox"/> WC STATUTORY LIMITS <input type="checkbox"/> OTHER	
						E.L. EACH ACCIDENT	\$1,000,000
						E.L. DISEASE-EA EMPLOYEE	\$1,000,000
						E.L. DISEASE-POLICY LIMIT	\$1,000,000
		OTHER					

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/EXCLUSIONS ADDED BY ENDORSEMENT/SPECIAL PROVISIONS

The following parties (all as defined in contract):

- 1) The United States Environmental Protection Agency;
- 2) Client and its employees, officers, directors, agents, partners, successors, and assigns;

CERTIFICATE HOLDER

Pastor Behling & Wheeler, LLC
Chromalloy American Corporation and the
Dow Chemical Company
2201 Double Creek Drive, Suite 4004
Round Rock TX 78664 USA

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

Aon Risk Services Southwest Inc

Attachment to ACORD Certificate for Fugro Consultants, Inc.

The terms, conditions and provisions noted below are hereby attached to the captioned certificate as additional description of the coverage afforded by the insurer(s). This attachment does not contain all terms, conditions, coverages or exclusions contained in the policy.

INSURED

Fugro Consultants, Inc.
6105 Rookin
Houston TX 77074 USA

INSURER
INSURER
INSURER
INSURER
INSURER

ADDITIONAL POLICIES

If a policy below does not include limit information, refer to the corresponding policy on the ACORD certificate form for policy limits.

INSR LTR	ADD'L INSRD	TYPE OF INSURANCE	POLICY NUMBER POLICY DESCRIPTION	POLICY EFFECTIVE DATE	POLICY EXPIRATION DATE	LIMITS	

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/EXCLUSIONS ADDED BY ENDORSEMENT/SPECIAL PROVISIONS

3) Consultant and its employees, officers, directors, agents, partners, successors, and assigns, are added as Additional Insureds, excluding workers' compensation and employers' liability, without regard to the fault or negligence, in whole or in part, of such additional insureds, as required by written contract but limited to the operations of the Insured for this project under said contract, and always subject to the policy terms, conditions and exclusions.

Waiver of Subrogation is granted in favor of Consultant and Client (as defined in contract) as required by written contract but limited to the operations of the Insured under said contract, and always subject to the policy terms, conditions and exclusions.

The policies certified hereon are primary to other insurance available to the certificate holder, but only to the extent required by written contract with the Insured, and always subject to the policy terms, conditions and exclusions.

Certificate No :

570026923913